

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
NORTHERN DIVISION**

<b>In the Matter of the Petition</b>  <b>Of</b>  <b>GRACE OCEAN PRIVATE LIMITED,</b> <b>as Owner of the M/V DALI,</b>  <b>And</b>  <b>SYNERGY MARINE PTE LTD, as</b> <b>Manager of the M/V DALI,</b>  <b>for Exoneration from or Limitation of</b> <b>Liability</b>	<b>Case No. 24-cv-000941-JKB</b>  <b><u>IN ADMIRALTY</u></b>  <b>Request for International Judicial</b> <b>Assistance Pursuant to Hague</b> <b>Convention of 18 March 1970 on the</b> <b>Taking of Evidence Abroad in Civil</b> <b>or Commercial Matters</b>
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**LETTER OF REQUEST**

*Request for International Judicial Assistance  
Pursuant to the Hague Convention of 18 March 1970 on  
the Taking of Evidence in Civil or Commercial Matters*

By the United States District Court,

District of Maryland

Hon. James K. Bredar

**TO THE DIRECTOR OF INTERNATIONAL AFFAIRS, NATIONAL COURT  
ADMINISTRATION OF THE REPUBLIC OF KOREA:**

The District of Maryland presents its compliments to the appropriate judicial authority of the National Court Administration of the Republic of Korea and requests international judicial assistance to obtain drawings, construction records, contracts, sea trial data, HiMap data, ACONIS data, and correspondence concerning the M/V DALI and its sister ships.

This Court requests the assistance described herein pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters, as adopted and implemented in the United States of America at 28 U.S.C. § 1781, and in the Republic of Korea by the Act on International Judicial Mutual Assistance in Civil Matters. The District of Maryland is a competent court of law and equity which properly has jurisdiction over this proceeding and has the power to compel the attendance of witnesses and production of documents both within and outside its jurisdiction.

The drawings, construction records, contracts, sea trial data, HiMap data, ACONIS data, and correspondence concerning the M/V DALI is intended for use in *In the Matter of the Petition of GRACE OCEAN PRIVATE LIMITED, as Owner of the M/V DALI, and SYNERGY MARINE PTE LTD, as Manager of the M/V DALI, for Exoneration from or Limitation of Liability*, Docket No. JKB 24-cv-941, and in the view of this Court will be highly relevant to the claims against the Petitioners related to the M/V DALI's management and operation.

This request is made with the understanding that it will in no way require any persons to commit any offense, or to undergo a broader form of inquiry than they would if the litigation were conducted in Republic of Korea. In the proper exercise of its authority, this Court has determined that the drawings, classification society audit records, and correspondence concerning the M/V DALI and its sister ships should be secured with the intervention of the National Court Administration of the Republic of Korea.

### **1. Senders**

Hon. James K. Bredar  
District Judge  
United States District Court, District of Maryland  
101 West Lombard Street, Chambers 5A  
Baltimore, MD 21201  
United States of America

### **2. Central Authority of the Requested State**

National Court Administration  
Attn: Director of International Affairs  
Seocho-daero 219  
Seocho-gu  
SEOUL 06590  
Republic of Korea

### **3. Person to whom the executed request is to be returned**

Margaret Fonshell Ward  
Downs Ward Bender Herzog & Kintigh, P.A.  
Executive Plaza 3, Suite 400  
11350 McCormick Road  
Hunt Valley, Maryland 21031  
United States of America  
Telephone: +1 443 589 3313  
Email: MWard@downs-ward.com

### **4. Specification of the date by which the requesting authority requires receipt of the response to the Letter of Request**

15 March 2025

**5. IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED APPLICANT HAS THE HONOR TO SUBMIT THE FOLLOWING REQUEST:**

**a. Requesting judicial authority (article 3(a))**

United States District Court  
District of Maryland  
101 West Lombard Street  
Baltimore, MD 21201  
United States of America

**b. To the competent authority of (article 3(a))**

National Court Administration  
Attn: Director of International Affairs  
Seocho-daero 219  
Seocho-gu  
SEOUL 06590  
Republic of Korea

**c. Name of case and identifying number**

*In the Matter of the Petition of GRACE OCEAN PRIVATE LIMITED, as Owner of the M/V DALI, and SYNERGY MARINE PTE LTD, as Manager of the M/V DALI, for Exoneration from or Limitation of Liability, Case No. 24-cv-000941-JKB, United States District Court, District of Maryland.*

**6. Names and addresses of the parties and their representatives (including representatives in the requesting state) (article 3(b))**

**a. Petitioners**

Grace Ocean Private Limited  
6 Shenton Way  
#35-01 OUE Downtown Singapore, 068809  
Singapore

**Representatives**

Blank Rome LLP  
William Bennett  
1271 Avenue of the Americas  
New York, NY 10020  
Telephone: +1 212 885 5152

Email: [william.bennett@blankrome.com](mailto:william.bennett@blankrome.com)

AND

Synergy Marine Pte Ltd  
1 Kim Seng Promenade  
#10-11/12 Great World City West Tower, Singapore, 237994  
Singapore

**Representatives**

Blank Rome LLP  
William Bennett  
1271 Avenue of the Americas  
New York, NY 10020  
Telephone: +1 212 885 5152  
Email: [william.bennett@blankrome.com](mailto:william.bennett@blankrome.com)

**b. Claimants**

The State of Maryland  
Office of the Attorney General  
200 St. Paul Place  
Baltimore, MD 21202

**Representatives**

Liskow & Lewis, APLC  
David L. Reisman  
701 Poydras Street, Suite 5000  
New Orleans, LA 70139  
United States of America  
Telephone: +1 504 556 4016  
Email: [DReisman@liskow.com](mailto:DReisman@liskow.com)

AND

Downs Ward Bender Herzog & Kintigh, P.A.  
Margaret Fonshell Ward  
Executive Plaza 3, Suite 400  
11350 McCormick Road  
Hunt Valley, Maryland 21031  
United States of America  
Telephone: +1 443 589 3313  
Email: [MWard@downs-ward.com](mailto:MWard@downs-ward.com)

**c. Additional Claimants**

1. Fornazor International, Inc
2. Hussain Ali Saeed AlDosariy
3. Timothy Mark Wilson (pro se)
4. Zim Integrated Shipping Services, LTD
5. MSC Mediterranean Shipping Company S.A.
6. NAJ Logistics Express, Inc. and Nejoun Al Jazeera Used Cars LLC
7. Wisconsin Spice, Inc.
8. JIJ International Holdings, LLC and Atlantic Specialty Insurance Company
9. ALTS USA, LLC and Atlantic Specialty Insurance Company
10. Skyline International Corporation and Atlantic Specialty Insurance Company
11. Mukesh Desai on behalf R.M Metals, a Division of R.M. Creations
12. Liberty Mutual Insurance Co
13. New York Marine and General Insurance Company and Certain Underwriters at Lloyd's of London, Axis Syndicate 1686
14. MSC Mediterranean Shipping Company S.A. and MSC Mediterranean Shipping Company Holding S.A.
15. Underwood Energy, Inc.
16. R.E. West, Inc.
17. R. Marine Motor Yacht Sales PTY LTD.
18. Captain C. Logistics LLC
19. International Trading Solutions, Inc
20. Penn Manufacturing Industries LLC
21. PMI ENG Exports Private TLD
22. PMI Global Technologies PVT LTD
23. Navision Shipping DK A/S
24. Consol Energy Inc.
25. Star Bulk (Singapore) PTE. LTD's
26. American Sugar Refining, Inc. and Florida Sugar & Molasses Exchange, Inc.
27. PMI ENG Exports Private TLD
28. PMI Global Technologies PVT LTD
29. Gerald Barney
30. Thomas Crawley
31. Ryan Hale
32. Tulani Hasan
33. Donny Jackson
34. Alonzo Key
35. Charles Peacock
36. Douglas Ramos
37. American Publishing, LLC
38. Karen Austin
39. Charles Austin, Jr.
40. Markel Syndicate Management Limited
41. Mayor and City Council of Baltimore
42. Baltimore County
43. Damon Davis
44. Julio Cervantes Suarez and Marisel Hernandez Salgado

45. Ace American Insurance Company
46. Brawner Builders
47. State Farm Insurance Companies
48. Baltimore Gas and Electric Company
49. Zurich American Insurance Co
50. Estate of Carlos Daniel Hernandez Estrella
51. Estate of Alejandro Hernandez Fuente
52. Estate of Miguel Angel Luna
53. Estate of Dorlian Ronial Castillo Cabrera
54. Estate of Maynor Suazo Sandoval
55. Estate of Jose Mynor Lopez

7.

**a. Nature of the action (article 3(c))**

Shipowner's Limitation of Liability action filed by the owners and managers of the M/V DALI for claims arising from the vessel's allision with and destruction of the Francis Scott Key Bridge in Baltimore, Maryland.

**b. Summary of complaint**

Following the allision of the M/V DALI with the Francis Scott Key Bridge in Baltimore, Maryland on 26 March 2025, the vessel's owners and managers filed this Limitation of Liability action, asserting that they should be entitled to limit their liability to the post casualty value of the M/V DALI.

**c. Summary of defenses and counterclaims**

The State of Maryland along with several other claimants have brought claims in the concursus established by the Limitation of Liability action. The State of Maryland and other claimants also assert that because the negligence and unseaworthy conditions that brought about the allision were within the privity and knowledge of the M/V DALI's owners and managers, neither claimant should be entitled to limit its liability.

8.

**a. Evidence to be obtained or other judicial act to be performed (article 3(d))**

Drawings, construction records, contracts, sea trial data, HiMap data, ACONIS data, and correspondence from HD Hyundai Heavy Industries Co., Ltd.

**b. Purpose of the evidence or judicial act sought**

The requested evidence from the time of vessel construction through the present which is only in the possession of HD Hyundai Heavy Industries Co., Ltd. is material to the question whether the owners and managers of the M/V DALI are entitled to limit their liability as a result of the allision with and destruction of the Francis Scott Key Bridge.

**9. Identity and address of any person to be examined (article 3(e))**

HD Hyundai Heavy Industries Co., Ltd.  
1000, Bangeojinsunhwan-doro, Dong-gu  
Ulsan, 44032  
South Korea

**10. Questions to be put to the persons to be examined or statement of the subject matter about which they are to be examined (article 3(f))**

Not Applicable

**11. Documents or other property to be inspected (article 3(g))**

1. All sea trial records for the M/V DALI.
2. All photographs, videos, drawings, and renderings of the M/V DALI from construction through the present;
3. All communications between HD Hyundai Heavy Industries Co., Ltd. and Synergy Marine PTE LTD relating in any way to the M/V DALI;
4. All communications between HD Hyundai Heavy Industries Co., Ltd. and Grace Ocean Private Limited relating in any way to the M/V DALI;
5. All communications between HD Hyundai Heavy Industries Co., Ltd. and the M/V DALI (including any member of its crew);
6. All communications between HD Hyundai Heavy Industries Co., Ltd. and the United States Coast Guard, Federal Bureau of Investigation, National Transportation Safety Board, or any other governmental entity relating in any way to the M/V DALI;
7. All communications between HD Hyundai Heavy Industries Co., Ltd. and any third-party service providers or technicians (including Everhonest Ship Engineering) relating in any way to the M/V DALI from delivery to the present;
8. All communications between HD Hyundai Heavy Industries Co., Ltd. and Stellar Marine LLC and Oceanbulk Maritime SA relating in any way to the M/V DALI;
9. All communications between HD Hyundai Heavy Industries Co., Ltd. and Blank Rome LLP relating in any way to the M/V DALI;
10. All communications between HD Hyundai Heavy Industries Co., Ltd. and Duane Morris LLP relating in any way to the M/V DALI;
11. All communications between HD Hyundai Heavy Industries Co., Ltd. and Seward Kissel LLP relating in any way to the M/V DALI;
12. All communications between HD Hyundai Heavy Industries Co., Ltd. and Streamline Marine Services relating in any way to the M/V DALI;
13. All service and/or repair reports for the M/V DALI in HD Hyundai Heavy Industries Co., Ltd.'s possession or to which HD Hyundai Heavy Industries Co., Ltd. has access;
14. The manuals, service bulletins, and maintenance requirements for all equipment manufactured by HD Hyundai Heavy Industries Co., Ltd. that is installed on the M/V DALI, including but not limited to the M/V DALI's transformers, and switchboards; and

15. All photographs, videos, drawings, records, reports, memoranda, bulletins, invoices, estimates, and communications of any kind regarding any drydock, repair, inspection, or diagnosis services provided by HD Hyundai Heavy Industries Co., Ltd. in connection with the M/V DALI from delivery to the present.
16. All shipboard data downloaded, documented, or otherwise collected by HD Hyundai Heavy Industries Co., Ltd. from any instruments, computers, hard drives or other data collection system(s) on the M/V DALI on or after March 26, 2024. Note that these files will include all data captured by any shipboard instruments prior to and after March 26, 2024. Please produce this data in both its raw (native) formats and in readable formats (e.g., “.txt”, “.csv”, “.xlsx”, “.pdf”, “.mdb”). This shipboard data includes (but are not limited to):
  - a. All Data from the ACONIS-DS Integrated Control & Monitoring System (ICMS) and Alarm Monitoring System (AMS) including all trend / time series data recorded onboard the ship (e.g., machinery data, electrical equipment data, alarms). All trend/time series data captured by any other onboard systems / equipment are also requested.
  - b. All data recorded by the ship’s Voyage Data Recorder (VDR).
  - c. All Hyundai Intelligent Measuring & Protection Device (HiMAP) data recorded onboard. Per “Hyundai Heavy Industries Instructions for Accessing Raw Data Extracted from MV Dali”, these include (but may not be limited to) HiMAP-BCG, HiMAP, HiMAP Main LO, HiMAP-FI, HiMAP Reefer TR, and HiMAP Scrubber Dist. data.
  - d. All CoCoS-EDS/PMI (Computer Controlled Surveillance-Engine Diagnostic System/Performance Measurement Indicator) data, as specified in the document titled “Hyundai Heavy Industries Instructions for Accessing Raw Data Extracted from MV Dali”.
  - e. All MOP (Main Operating Panel) data, as specified in the document titled “Hyundai Heavy Industries Instructions for Accessing Raw Data Extracted from MV Dali”.
  - f. All Fluke data, as specified in the document titled “Hyundai Heavy Industries Instructions for Accessing Raw Data Extracted from MV Dali”.
  - g. All Sonel data, as specified in the document titled “Hyundai Heavy Industries Instructions for Accessing Raw Data Extracted from MV Dali”.
17. All shipboard data captured during the vessel’s initial sea trials and any sea trials performed after the installation of the scrubber system. Please produce this data in both its raw (native) formats and in readable formats (e.g., “.txt”, “.csv”, “.xlsx”, “.pdf”, “.mdb”). This shipboard data includes (but are not limited to):
  - a. All Data from the ACONIS-DS Integrated Control & Monitoring System (ICMS) and Alarm Monitoring System (AMS) including all trend / time series data recorded onboard the ship (e.g., machinery data, electrical equipment data, alarms). All trend/time series data captured by any other onboard systems / equipment are also requested.
  - b. All data recorded by the ship’s Voyage Data Recorder (VDR).
  - c. All Hyundai Intelligent Measuring & Protection Device (HiMAP) data recorded onboard. Per “Hyundai Heavy Industries Instructions for Accessing Raw Data Extracted from MV Dali”, these include (but may not be limited to) HiMAP-BCG,



- HiMAP, HiMAP Main LO, HiMAP-FI, HiMAP Reefer TR, and HiMAP Scrubber Dist. data.
- d. All CoCoS-EDS/PMI (Computer Controlled Surveillance-Engine Diagnostic System/Performance Measurement Indicator) data, as specified in the document titled “Hyundai Heavy Industries Instructions for Accessing Raw Data Extracted from MV Dali”.
  - e. All MOP (Main Operating Panel) data, as specified in the document titled “Hyundai Heavy Industries Instructions for Accessing Raw Data Extracted from MV Dali”.
  - f. All Fluke data, as specified in the document titled “Hyundai Heavy Industries Instructions for Accessing Raw Data Extracted from MV Dali”.
  - g. All Sonel data, as specified in the document titled “Hyundai Heavy Industries Instructions for Accessing Raw Data Extracted from MV Dali”.
18. A copy of the SPT Software (as specified in the document titled “Hyundai Heavy Industries Instructions for Accessing Raw Data Extracted from MV Dali”) with the appropriate license provided for opening and reading HiMAP files (i.e., those with extension “.spt” and “.shf”).
    - a. If a copy of the SPT software specified in as specified in the document titled “Hyundai Heavy Industries Instructions for Accessing Raw Data Extracted from MV Dali” and appropriately licensing cannot be provided, We request access to a PC with the software for unobstructed review of the HiMAP-BCG files provided by HD Hyundai Heavy Industries Co., Ltd. in response to this Letter of Request or to the NTSB for use in its investigation into the Allision, including the ability to review the data with the use of the software, document and export the content of analysis made with the software to external storage devices.
  19. Converted versions of all HiMAP-BCG files (i.e., those with extension “.spt” and “.shf”) provided by HD Hyundai Heavy Industries Co., Ltd. in response to this Letter of Request or to the NTSB for use in its investigation into the Allision, including the entirety of each file’s contents, into a readable format (i.e., “.txt”, “.csv”, or “.xlsx”).
  20. A copy of all MAN CoCoS-EDS/PMI (Computer Controlled Surveillance-Engine Diagnostic System/Performance Measurement Indicator) data provided by HD Hyundai Heavy Industries Co., Ltd. to the NTSB.
  21. A copy of the “CoCoS Data Plotter” software with the appropriate license provided for opening and reading CoCos-EDS/PMI data files (with extension “.eds”).
    - a. If a copy of the “CoCoS Data Plotter” software and appropriately licensing cannot be provided, We request access to a PC with the software for unobstructed review of these CoCoS-EDS/PMI files provided by HD Hyundai Heavy Industries Co., Ltd. in response to this Letter of Request or to the NTSB for use in its investigation into the Allision, including the ability to review the data with the use of the software, document and export the content of analysis made with the software to external storage devices.
  22. Converted versions of all CoCos-EDS/PMI data files (i.e., those with extension “.eds”), provided by HD Hyundai Heavy Industries Co., Ltd. in response to this Letter of Request or to the NTSB for use in its investigation into the Allision including the entirety of each file’s contents, into a readable format (i.e., “.txt”, “.csv”, or “.xlsx”).

**12. Any requirement that the evidence be given on oath or affirmation and any special form to be used (article 3(h))**

Not Applicable

**13. Special methods or procedure to be followed (articles 3(i) and 9)**

Not Applicable

**14. Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified (article 7)**

Please notify the following counsel regarding the time and place for the execution of the Request:

Liskow & Lewis, APLC  
David L. Reisman  
701 Poydras Street, Suite 5000  
New Orleans, LA 70139  
United States of America  
Telephone: +1 504 556 4016  
Email: DReisman@liskow.com

**15. Request for attendance or participation of judicial personnel of the requesting authority at the execution of the Letter of Request (article 8)**

No attendance of judicial personnel is requested.

**16. Specification of privilege or duty to refuse to give evidence under the law of the State of origin (article 11(b))**

Not Applicable

**17. The fees and costs incurred which are reimbursable under the second paragraph of article 14 or under article 26 of the Convention will be borne by**

The State of Maryland

**18. Date of Request**

Dated: \_\_\_\_\_

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Hon. James K. Bredar  
District Judge

